

A F F I D A V I T

STATE OF WEST VIRGINIA

COUNTY OF CABELL, to-wit:

I, Georgia Marshall, being duly sworn, do hereby depose and state the following:

**I. INTRODUCTION**

1. I am a Special Agent (SA) with the Federal Bureau of Investigation ("FBI"). I have been so employed since May 2019. I am currently assigned to the Pittsburgh Division and stationed at the Huntington Resident Agency in Huntington, West Virginia. My duties include investigating violations of federal child exploitation and child pornography laws.

2. I have received training on various aspects of federal investigations, including the investigation of child pornography, child exploitation cases, and abuse of children. This training includes specialized instruction on how to conduct criminal investigations related to violations of child protection laws pursuant to Title 18, United States Code, Sections 2251, 2252, 2252A, and 2256.

3. Through my training and experience, I am familiar with the operational techniques and organizational structure of child

pornography distribution networks and child pornography possessors and their use of computers and other media devices.

4. As a special agent, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have obtained search warrants for child pornography offenses, and I have been the case agent or assisted others in numerous investigations involving the sexual exploitation of children. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2252(a)(2)(A) and (B)(2) (receipt or distribution of images, in interstate or foreign commerce, depicting a minor engaging in sexually explicit conduct), 2252A(a)(2) (receipt or distribution of child pornography), and 2252A(a)(5)(B) (possession of child pornography).

5. This affidavit is intended only to show that there is sufficient probable cause for the complaint and does not set forth all of your affiant's knowledge regarding the facts of this case.

**II. BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE**

6. On October 15, 2020, the Child Exploitation Operational Unit (hereinafter "CEOU") received information from the United Kingdom (hereinafter "UK") regarding KIK user HARDLYEVERSLEEPS. During the course of an investigation, UK law enforcement

identified and arrested KIK user DIRUG121212. A forensic examination of KIK user DIRUG121212's electronic devices revealed a large volume of chat logs containing conversations about the sexual abuse of children.

7. KIK user HARDLYEVERSLEEPS was identified as a user communicating with KIK user DIRUG121212 about the sexual abuse of children. KIK user HARDLYEVERSLEEPS was in communication with KIK user DIRUG121212 between May 21, 2020, through June 8, 2020. Over the course of the chats, HARDLYEVERSLEEPS stated he and his wife have been actively abusing three children, ages 3, 5, and 11 years old. HARDLYEVERSLEEPS revealed that the children he abused were his two nieces and a cousin. HARDLYEVERSLEEPS stated that the children were abused while they slept, and the children would never tell anyone about the abuse. During one chat conversation from May 25, 2020, between HARDLYEVERSLEEPS and DIRUG121212, DIRUG121212 distributed two video files of child pornography and/or child sexual abuse material to HARDLYEVERSLEEPS, c08821b1-f33f-4cea-8ae4-9cc6deb482e6 and 37a5fd9d-1ba1-49c1-af1e-7d64371ec6d3. Video file 37a5fd9d-1ba1-49c1-af1e-7d64371ec6d3 depicts a prepubescent child on a bed. An adult hand is seen pulling the child's pants and diaper down and revealing the child's the buttocks. Video file c08821b1-f33f-4cea-8ae4-9cc6deb482e6 depicts an adult hand pulling

down the same prepubescent child's pants and diaper. Focus of the camera is between the child's legs. The hand pulls the buttock cheeks apart. Following the distribution, HARDLYEVERSLEEPS requested additional child sexual abuse material content be sent to him over KIK, specifically when HARDLYEVERSLEEPS wrote "Spread her pussy please," "Would love to see you rape her," "Pull them down and spread her legs and let's see how she responds," "Pull them all the way this time," and "Let's see more of her."

8. In a conversation on May 27, 2020, DIRUG121212 asked HARDLYEVERSLEEPS to send a picture of his niece sleeping. In response, HARDLYEVERSLEEPS sent video file ba0a3bb3-6c40-4e67-9c51-cf852965cbdb, which contained an approximately 2 second video of a hand rubbing a nipple.

9. The CEOU issued an emergency disclosure to KIK for KIK user HARDLYEVERSLEEPS. There were no IP logs identified, but KIK provided two IP addresses for the user's location. One resulted back to a VPN which did not provide any additional information. The other was a United States' based IP address, 184.13.75.160.

10. An administrative subpoena was issued to Frontier Communications, Inc. for IP address 184.13.75.160. The subscriber information returned to Select Comfort Corporation, 16 Mall Rd, Barboursville, WV, phone number 304-736-6212. On November 20,

2020, your affiant identified that a Sleep Number retail store was located at 16 Mall Rd, Barboursville, WV. Your affiant went to the store and confirmed that Nicholas WILDS (hereinafter "WILDS") was currently employed at that location.

11. A search of FBI systems for records of HARDLYEVERSLEEPS revealed that subscriber information for KIK user HARDLYEVERSLEEPS was subpoenaed by the Milwaukee FBI division on April 10, 2020, in connection to an investigation into KIK chat groups that were trading child pornography and talking about the sexual abuse of children. The subpoena return revealed the email associated with the account was [heywuehehehe@gmail.com](mailto:heywuehehehe@gmail.com) and IP logs associated with the account identified IP address 76.26.81.154.

12. The CEOU served a subpoena to Comcast Communications, Inc. for information on IP address 76.26.81.154 from October 20, 2019 to October 20, 2020. The subscriber information returned to NICHOLAS WILDS of 4425 16th Street Rd, Huntington, WV 25701-9764, phone number 304-690-6069.

13. On December 4, 2020, United States Magistrate Judge Cheryl A. Eifert signed a search warrant in the Southern District of West Virginia for information pertaining to KIK Username HARDLYEVERSLEEPS from April 1, 2020, through December 3, 2020.

14. On December 7, 2020, KIK returned information for KIK user HARDLYEVERSLEEPS pursuant to the federal search warrant. KIK advised in the return that the company no longer retains message content for their users, but did provide logs relevant to KIK user HARDLYEVERSLEEPS' account.

15. A review of KIK logs titled "chat\_platform\_sent" yielded that HARDLYEVERSLEEPS has sent approximately 353 various video or image files to other KIK users. Some of these files indicate that the image was taken from HARDLYEVERSLEEPS' camera or was taken from his gallery. The KIK logs titled "group\_send\_msg\_platform" provided that HARDLYEVERSLEEPS sent numerous videos to various KIK groups.

16. A review of the KIK logs revealed that HARDLYEVERSLEEPS used IP address 76.26.81.154 to send various videos and images. That IP address was the same one the CEOU served a subpoena on to Comcast, which resulted back to WILDS.

17. A review of Department of Motor Vehicles (DMV) records for WILDS yielded his listed address as 4425 16<sup>th</sup> Street Road, Huntington, WV 25701.

18. On March 9, 2021, your affiant obtained a search warrant for the residence located at 4425 16<sup>th</sup> Street Road, Huntington, WV

25701. The search warrant was executed on March 16, 2021. Several electronic devices were seized for forensic evaluation.

19. Forensic evaluation of a cellular phone is ongoing; however, a preliminary review yielded that WILDS was signed into a KIK account with username SPUNCLOUDBLOWINGPERV with associated email hdhdhdhdjjn@gmail.com. The account was created on March 10, 2021. On the cellular phone there were over 300 images and two videos of child sexual abuse material. A review of three images and one video can be found below:

- a. Image 1 - Filename: I4kQBaza\_1 Description: A naked prepubescent female child with her legs spread showing her vagina. There was text on the photo that said "CHILD PORN IT'S PRETTY FUCKING AWESOME This public service announcement has been brought to you by the American Child Pornography Advocacy Association."
- b. Image 2 - Filename: YttQKITZ\_1 Description: A prepubescent female child laying on her stomach with a nude lower half with an adult male's penis penetrating her.
- c. Image 3 - Filename: 018knIZI Description: A prepubescent male child performing fellatio on an adult male.
- d. Video 1 - Filename: partynight\_12.mpg Description: An adult male was nude from the waist down kneeling over a child under

the age of one year old. The adult's penis is erect, and he is masturbating over top of the child. The adult ejaculates and some of the ejaculate land on the child's head. The video duration is approximately 23 seconds.

20. WILDS was interviewed and provided that he did have a KIK account, but he did not recall what his username was. WILDS stated he used his KIK account to talk to other local woman. Sometimes WILDS sent "dick" pictures over Kik.

21. In July 2021, the FBI received CyberTip Report 87906830 from Kik. The report contained nine videos containing child sexual abuse material from Kik user SPUNUPCLOUDS, with associated email address hdhshshddnn@gmail.com. Pursuant to a subpoena, KIK provided that KIK User SPUNUPCLOUDS accessed IP address 76.26.64.19 on February 7, 2021 and February 15, 2021.

22. A subpoena to Comcast for the subscriber information for IP address 76.26.64.19 on February 7, 2021 and February 15, 2021 provided the subscriber was Nicholas WILDS and a service address of 4425 16<sup>th</sup> Street Road, Huntington, WV. The internet service for that account was disconnected on February 18, 2021.

23. Your affiant conducted a review of the nine videos contained in the CyberTip 87906830. All nine videos contained child sexual abuse material and appeared to be uploaded to KIK on March

5, 2021. Additionally, all nine videos were distributed to other KIK users via a private chat message. The videos are described below:

a. Video 1 - Filename: a06bdfcd-c397-4b14-9ebb-93de24b9be05.mp4

Description: A video of a child, approximately one to two years old, performing fellatio on an adult male. The video duration was approximately 16 seconds.

b. Video 2 - Filename: 2af878a4-59c2-4b30-950c-a7c6b38b645c.mov

Description: A video of an adult male performing cunnilingus on a child's vagina and then touching the child's vagina with his fingers. The child appeared to be approximately one to two years old. The video duration was approximately 32 seconds.

c. Video 3 - Filename: f79db664-269d-499f-a772-a1f4242f3a48.mp4

Description: A video of an adult's fingers penetrating a baby's anus and separating the baby's buttocks cheeks. The baby appeared to be under one year old. The video duration was approximately 14 seconds.

d. Video 4 - Filename: 976b1de9-ebde-48bf-8518-318d8308b771.mp4

Description: A video depicting an adult male penis touching a baby's face and going into the baby's mouth. The baby

appeared to be under one year old. The video duration was approximately 36 seconds.

e. Video 5 - Filename: c5c9c810-5d29-4b24-9cc1-c68e133f600e.mov

Description: A video of an adult male penis that was rubbed on the face and near the mouth of a baby. The baby appeared to be under one year old. The video duration was approximately 14 seconds.

f. Video 6 - Filename: 17df602c-5c81-45bb-9867-5a10f7d4e08b.mov

Description: A video of an adult male penis that was rubbed on the vagina and near the anus of a baby. The baby appeared to be under one year old. The video duration was approximately 26 seconds.

g. Video 7 - Filename: cebfb348-12e2-4d99-a8ac-1f0d9e4f84ca.mov

Description: A video of an adult male penis that was placed between a baby's legs on their stomach and the baby was touching the penis with their hands. The baby appeared to be under one year old. The video duration was approximately 15 seconds.

h. Video 8 - Filename: 9aad21c9-cee1-4006-8549-e613419dd2e3.mov

Description: A video of a baby sitting on a nude adult male's lap with the adult's erect penis in between the baby's legs. The adult's hands pulled the buttock cheeks of the baby apart

to show the baby's anus. The baby tried to crawl off the adult's lap and put their hands on the adult's penis. The adult male then rubbed his penis with his hand. The video cuts to the baby in a pink onesie in a baby carrier. The baby appeared to be under one year old. The video duration was approximately 36 seconds.

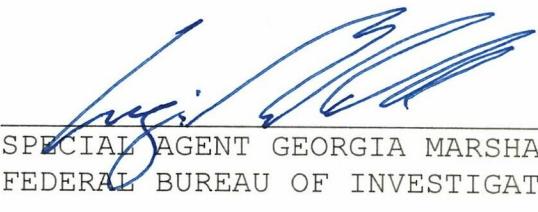
i. Video 9 - Filename: c8d854be-58b0-451c-8073-e5a47ecf39cb.mov

Description: A video of an adult male penis that was rubbed on a child's vagina. The male then started touching his penis with his hand. The child also touched the adult's penis. The child appeared to be approximately two years old. The video duration was approximately 31 seconds.

**IX. CONCLUSION**

Your affiant respectfully submits that there is probable cause to believe NICHOLAS WILDS, while located at or near Cabell County, West Virginia, and within the Southern District of West Virginia, knowingly distributed child pornography in and affecting interstate commerce by any means, including by computer, in violation of 18 U.S.C. §§ 2252A(a)(4)(A) and 2252A(b)(1), on March 5, 2021.

Further your affiant sayeth naught.

  
SPECIAL AGENT GEORGIA MARSHALL  
FEDERAL BUREAU OF INVESTIGATIONS

Sworn to before me, and subscribed by telephone, this 4th day of November, 2021:



  
Omar J. Aboulhosn

Omar J. Aboulhosn  
United States Magistrate Judge